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May 1, 2024

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. James Sorce*  
S1 22 Cr. 642 (ALC)**

Dear Judge Carter:

I represent the above-named defendant. The within is a joint motion made on behalf of Mr. Sorce and the Government requesting that the status conference now scheduled for May 7, 2024, at 12:00 p.m., be adjourned. Discussions between the parties have been on-going regarding discovery and in the hope of reaching an appropriate resolution of the case. Significantly, too, AUSA Matthew R. Shahabian presently is on trial.

It is respectfully requested that the aforesaid conference be adjourned to a date during the week of July 8 or the week of July 22, 2024, if that is convenient for the Court. Further, the Government respectfully requests, and defendant consents to, an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between May 7, 2024 and the rescheduled conference date. An exclusion is in the interest of justice because it will allow the parties to continue to discuss a potential disposition of the case. A joint motion for adjournment of an earlier-scheduled conference, which was granted by the Court, previously was made by the Government.

Thank you for your attention to this matter.



Respectfully submitted,

/s/

JAMES ADAM PASCARELLA (JP1496)

CC.:  
To all parties via ECF

The application is **GRANTED**. The status conference is adjourned to 7/9/24 at 12 p.m. Time excluded from 5/7/24 to 7/9/24 in the interest of justice.  
So Ordered.



5/2/24